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August 8, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Applications of Cellco Partnership d/b/a Verizon Wireless, SpectrumCo LLC, and Cox TMI Wireless, LLC, WT Docket No. 12-4; Applications of Cellco Partnership d/b/a Verizon Wireless and T-Mobile License LLC, WT Docket No. 12-175
Notice of *Ex Parte* Meeting

Dear Ms. Dortch,

On Tuesday August 7th, I spoke by phone with, Louis Peraertz, Legal Advisor to Commissioner Clyburn.

During the call, I discussed Free Press' arguments on the issue of Wi-Fi offloading presented on pages 13-19 of our written *ex parte* submitted on June 4th, 2012. I emphasized that Verizon's new *mandatory* "family share" plans illustrate that Verizon's preferred business model is to sell as much monthly data as possible, and argued that this business model creates strong disincentives for Verizon to increase its use of carrier-grade Wi-Fi offloading. I argued that though Verizon is not likely to make broad use of the cable provider's Wi-Fi networks to offload traffic (because it would rather sell more cellular data than offload that traffic), that Verizon does have strong incentives to ensure its wireless competitors are not able to use that capacity. I pointed out that the partnership between Verizon and the cable companies will enable Verizon to foreclose its competitors from accessing these Wi-Fi networks. I noted that prior to these transactions the cable companies had strong incentives to sell capacity on their Wi-Fi hotzone networks to any and all cellular carriers, but that the virtual marriage of the cable companies with Verizon completely reverses these incentives.

Sincerely,

/s/

S. Derek Turner
Research Director
Free Press
dturner@freepress.net

cc (via email):
Louis Peraertz